

REMARKS

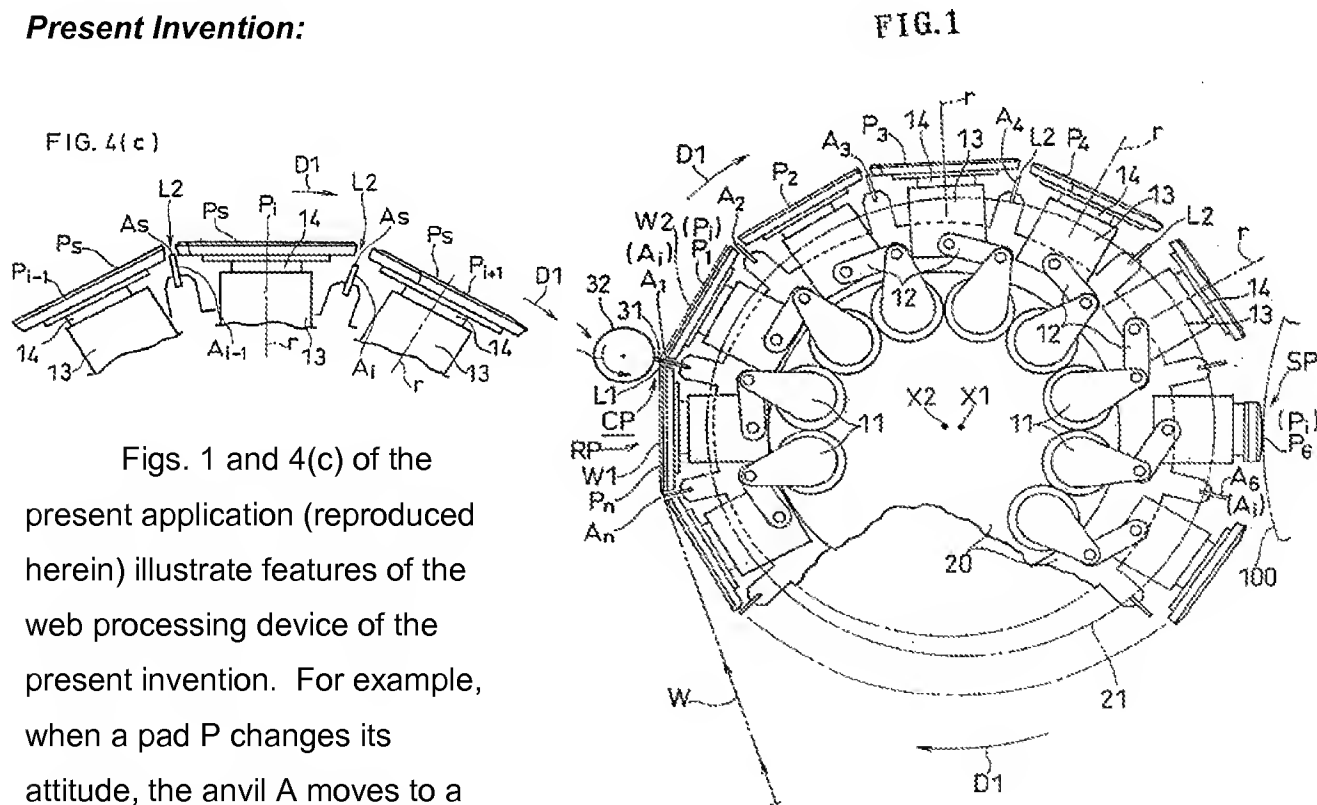
Claims 1-11 are pending in the application. Claims 1, 4 and 7 have been amended herein, and claims 8-11 have been added. Favorable reconsideration of the application, as amended, is respectfully requested.

Applicants have amended claims 1, 4 and 7 to address the informalities noted by the Examiner.

I. REJECTION OF CLAIMS 1, 3 AND 7 UNDER 35 USC §103(a)

Claims 1, 3 and 7 stand rejected under 35 USC §103(a) based on *JP 09294769* ("Maeda et al.") in view of *Satoh*. Applicants respectfully request withdrawal of the rejection for at least the following reasons.

Present Invention:



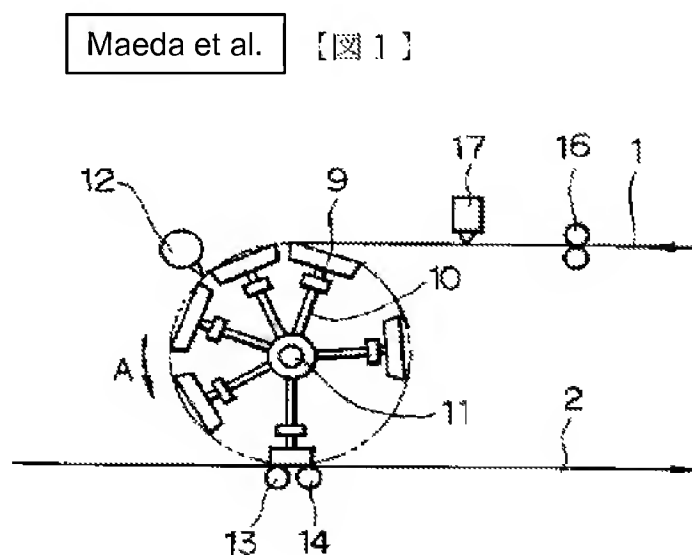
to the surface of the pad P so as not to hinder the pad changing its attitude. As is shown in Fig. 1, for example, as the pads rotate about axis X1 the relative level of the anvil A changes so as not to hinder a change in attitude of the pad P.

Applicants have amended claims 1 and 7 to make clear that the second relative level to which the anvil A moves so as not to hinder the pad changing its attitude is a level different from the first relative level where the anvil is brought into contact with the cutter.

Fig. 1 also illustrates a feature of the invention relating to the respective axes of rotation of the pads P and the anvils A. As illustrated in Fig. 1 and described in the present application, the plurality of pads P each rotate about the same axis X1. On the other hand, each of the plurality of anvils each rotate about the same axis X2. The axis of rotation X1 of the plurality of pads P and the axis of rotation X2 of the plurality of anvils A are generally parallel to each other and are out of alignment with each other. An anvil at the second relative level is positioned inward closer to the axis X1 than the anvil A at the first relative level.

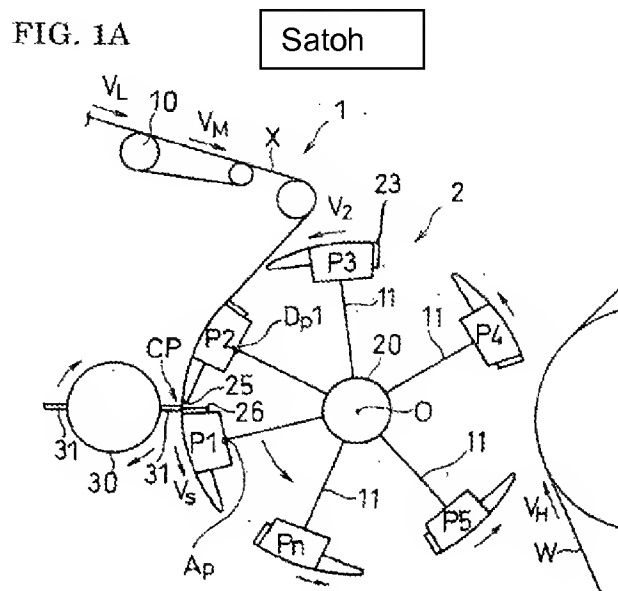
Maeda et al. & Satoh:

The Examiner relies on *Maeda et al.* as teaching a web processing device which includes a plurality of pads and a cutter where the pads change attitude. Applicants acknowledge that *Maeda et al.*, particularly with respect to paragraph 0023, teaches that the cutter 12 may be combined with an anvil. However, not only does *Maeda et al.* fail to teach a plurality of anvils as noted by



the Examiner, *Maeda et al.* does not teach *how* the cutter 12 may be combined with an anvil and still enable the attitude of the pad to be changed without the anvil hindering the change.

In order to make up for the deficiency in *Maeda et al.* as not teaching a plurality of anvils, the Examiner relies on *Satoh*. Specifically, the Examiner points out that *Satoh* illustrates a plurality of anvils 23 each of which are attached to a corresponding pad P. (See Fig. 1A reproduced herein). The Examiner submits that it would have been obvious to combine the plurality of anvils 23 in *Satoh* with the plurality of pads in *Maeda et al.*



Even assuming for sake of argument that one having ordinary skill would make such combination, this would result merely in each pad P in *Maeda et al.* including an anvil as part thereof as in *Satoh*. There is no teaching or suggestion as to how or why the relative level of the anvil with respect to the surface of the pad adjacent the anvil could be changed such that an anvil will not hinder the pad changing its attitude.

Presumably recognizing such distinction, the Examiner notes in the Office Action that “the claims do not preclude a device having a first relative level and a second relative level at the same level where changing of attitude of the pads is not hindered at both levels”. (Emphasis Added). In order to make clear their intent not to encompass a construction as in *Satoh* where a pad and corresponding anvil inherently remain at the same level, applicants have amended claims 1 and 7 to emphasize that the first and second relative levels of the anvil relative to the surface of the pad are different levels.

Neither *Maeda et al.* nor *Satoh*, teach, suggest or otherwise render obvious a web processing device and method having a configuration as recited in amended claims 1 and 7. Applicants respectfully request withdrawal of the rejection.

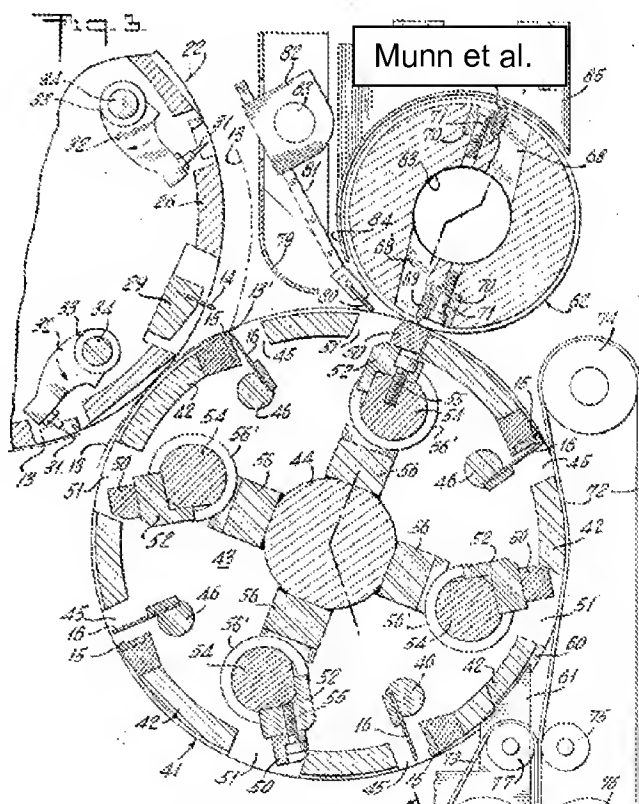
II. REJECTION OF CLAIMS 1-7 UNDER 35 USC §103(a)

Claims 1-7 stand rejected under 35 USC §103(a) based on *Maeda et al.* in view of *Munn et al.* Applicants respectfully request withdrawal of this rejection for at least the following reasons.

The Examiner now relies on *Munn et al.* as making up for the deficiency in *Maeda et al.* with respect to the plurality of anvils wherein a second relative level is more retracted inward than a first relative level. The Examiner submits that it would have been obvious to employ retractable anvils as taught by *Munn et al.* in the device of *Maeda et al.* in order not to hinder the attitude changing operation of the pads with the anvils.

Specifically, the Examiner refers to *Munn et al.*'s teaching of a plurality of anvils 50 which are retractable relative to the surface of cylinder wall portions 42.

Applicants acknowledge the teachings of *Munn et al.* insofar as retractable anvils 50. However, *Munn et al.* teaches the use of retractable anvils 50 as part of a signature cutting and trimming device. In *Munn et al.*, the anvils 50 are described as being retractable for purposes of avoiding interference with the pind 31 on the transporting and folding cylinder 22 stripper blades 61 and belt 72 (see, e.g., column 4, line 66-column 5, line 2).



In other words, *Munn et al.* teaches that it is necessary to retract the anvils 50 to avoid interfering with pinds 31. There is no recognition of a problem in *Munn et al.* with

respect to changing an attitude of the cylinder wall portions 42. This is, of course, because *Munn et al.* is in no way concerned with changing an attitude of the cylinder wall portions 42. Thus, *Munn et al.* does not in any way present the aspect of the retractable anvils for purposes of not hindering a changing attitude of the cylinder wall portions 42. In fact, as shown in Fig. 3 of *Munn et al.* (reproduced herein), the anvils 50 are not even retracted sufficiently to permit a change in attitude of the cylinder wall portions 42.

Consequently, *Maeda et al.* does not present a problem associated with an anvil hindering a pad changing its attitude and *Munn et al.* does not teach or suggest a solution. Applicants therefore respectfully submit that one having ordinary skill in the art would not have found it obvious to combine the teachings of *Maeda et al.* and *Munn et al.* as proposed by the Examiner. Moreover, even if the references were combined as proposed the retractable anvils of *Munn et al.* would not permit the pad changing its attitude to remain unhindered as described above.

Accordingly, the rejection of claims 1, 4 and 7 should be withdrawn.

Claims 2 and 5:

Regarding claims 2 and 5, these claims each recite the above discussed aspect of the invention whereby each of the plurality of pads revolves generally about the same first axis (X1) and each of the plurality of anvils revolves generally about the same second axis (X2). The first and second axes are generally parallel to each other and are out of alignment with each other.

Presumably in support of the rejection of claims 2 and 5, the Examiner notes in the Office Action “[t]he modified device of ‘769 (*Maeda et al.*) teaches the anvils turn about a second axis which is generally parallel to a first axis and out of alignment with each other”. Applicants respectfully disagree.

Specifically, in *Munn et al.* each anvil 50 is mounted to a central shaft 44 via a block 56. As such, each anvil 50 rotates about a first axis defined by a central shaft 44. Such first axis defined by the central shaft 44 is the same axis around which the cylinder

wall portions 42 each rotate. Thus, the plurality of anvils 50 and the plurality of cylinder wall portions 42 in *Munn et al.* each rotate about the same axis represented by the central shaft 44.

Although not expressly stated, perhaps the Examiner is referring to each of the anvils 50 in *Munn et al.* also rotating about a corresponding shaft 54. As is described in *Munn et al.*, each anvil 50 rotates about a corresponding shaft 54 to provide retraction of the particular anvil 50. However, applicants respectfully submit that rotation about a corresponding shaft 54 does not constitute rotation about a second axis as claimed.

More particularly, claims 2 and 5 recite that “each anvil revolves generally about a second axis”. Applying basic principles of claim construction, claims 2 and 5 refer to each anvil revolving about the same second axis. Claims 2 and 5 do not refer to each anvil revolving about its own corresponding second axis. There is antecedent basis for only a single second axis and, consistent with that which is described in the present application, must be construed as referring to each of the plurality of anvils revolving about the same second axis (which is offset from the first axis).

Munn et al. clearly does not teach or suggest such features as recited in claims 2 and 5. Nor, of course, does *Maeda et al.* Consequently, the rejection of claims 2 and 5 should be withdrawn also for the above-discussed additional reasons.

Applicants therefore respectfully request withdrawal of the rejection of all claims 1-7.

III. CONCLUSION

Claims 8-11 further define relevant features of the invention, and specifically the relative positions of the respective axes. Support for such claims is found, for example, in paragraph 0025 and the figures. The cited references similarly fail to teach or suggest the particular orientations of the axes as recited in claims 8-11.

Accordingly, all claims 1-11 are believed to be allowable and the application is believed to be in condition for allowance. A prompt action to such end is earnestly solicited.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application, the Examiner is invited to contact the undersigned at the telephone number provided below.

Should a petition for an extension of time be necessary for the timely reply to the outstanding Office Action (or if such a petition has been made and an additional extension is necessary), petition is hereby made and the Commissioner is authorized to charge any fees (including additional claim fees) to Deposit Account No. 18-0988.

Respectfully submitted,

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Reg. No. 34,243

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